

# **EXHIBIT 9**

IN THE  
CIRCUIT COURT FOR BALTIMORE CITY

IBN WILLIAMS,

*Plaintiff,*

v.

Civil Case No. 24-C-22-004662

COPPIN STATE UNIVERSITY, et al.,

*Defendants.*

\*

\*

\*

\*

\*

23 SEP 18 PM 4:19  
CIVIL DIVISION  
CIRCUIT COURT FOR  
BALTIMORE CITY

\* \* \* \* \*

**DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADING**

Defendants, Coppin State University, the University System of Maryland, the State of Maryland, Derek Carter, and Juan Dixon, (collectively the "University Defendants"), by their undersigned counsel, respectfully request an extension of time to file their response to the Complaint until all University Defendants have been properly served, and state as follows:

1. Plaintiff, Ibn Williams, filed a five-count complaint against the University Defendants and Lucien Brownlee asserting claims of negligence, negligent hiring and retention, negligent infliction of emotional distress, intentional infliction of emotional distress, and breach of contract relating to their management of the Coppin State University basketball program, and those in positions of authority over the basketball program, while he was a student-athlete on the basketball team.

2. Plaintiff attempted to effect service on the University Defendants, but did not effect service properly. On December 1, 2022, by email and telephone, undersigned counsel informed Plaintiff's counsel that service had not been effected upon any of the University Defendants, and provided information about how to effect service properly on each of them.

3. Thereafter, on December 22, 2022, Plaintiff perfected service upon Defendant Derek Carter and the Office of the Attorney General (with respect to Count V for breach of contract).

4. On the same date, service was attempted upon the State Treasurer's Office for the tort claims (Counts I-IV), as required by Md. Code Ann, State Gov't §12-108. However, on December 27, 2022, the State Treasurer's Office informed Plaintiff's counsel that service was not proper and was therefore rejected, as the summons was not directed to the State Treasurer.

5. On January 11, 2023, service was properly effected upon Defendant Juan Dixon.

6. To date, Plaintiff's counsel has requested that the clerk issue a new summons directed to the State Treasurer, and has indicated that once issued, service will be effected promptly upon the State Treasurer with respect to Counts I-IV.

7. It would conserve the parties' and the Court's resources, and avoid duplicative filings, for the University Defendants, all of whom will be represented by undersigned counsel, to file a single responsive pleading to the Complaint after the State Treasurer's Office has been served, rather than filing multiple responses on different dates.

8. The University Defendants submit that this request will not cause undue delay or prejudice.

9. Plaintiff's counsel consents to this request.

WHEREFORE, the University Defendants respectfully request that the Court extend the deadline for the University Defendants to file a responsive pleading to the Complaint until thirty (30) days after Plaintiff has perfected service upon the State Treasurer, at which time the University Defendants will file a single responsive pleading. A proposed Order is attached.

Respectfully submitted,

ANTHONY G. BROWN  
Attorney General of Maryland

/s/ Ariel Lichterman

---

ARIEL LICHTERMAN  
Attorney No. 1801110004  
Assistant Attorney General  
Office of the Attorney General  
200 St. Paul Place, 17th Floor  
Baltimore, Maryland 21202  
alichterman@oag.state.md.us  
(410) 576-6459  
(410) 576-6437 (facsimile)

January 18, 2023

Attorneys for Coppin State University,  
the University System of Maryland, the  
State of Maryland, Derek Carter, and Juan  
Dixon

**CERTIFICATE OF SERVICE**

I certify that, on this 18th day of January, 2023, the foregoing was served by first-class mail and email on all persons entitled to service:

Peter Anderson, Esq.  
Kayann Chambers, Esq.  
Morgan & Morgan  
1901 Pennsylvania Ave. N.W., Suite 300  
Washington, DC 20006  
panderson@forthepeople.com  
kschambers@forthepeople.com

/s/ Ariel Lichterman

---

Ariel Lichterman

IN THE  
CIRCUIT COURT FOR BALTIMORE CITY

IBN WILLIAMS,

*Plaintiff,*

v.

Civil Case No. 24-C-22-004662

COPPIN STATE UNIVERSITY, et al.,

*Defendants.*

\* \* \* \* \*

**PROPOSED ORDER**

Upon consideration of the Consent Motion for Extension of Time to File a Responsive Pleading filed by Defendants Coppin State University, the University System of Maryland, the State of Maryland, Derek Carter, and Juan Dixon, (collectively the “University Defendants”), and good cause appearing therefore, it is this \_\_\_\_\_ day of January, 2023, ORDERED:

That the University Defendants’ Motion for Extension of Time is hereby GRANTED; and

The University Defendants shall file a single response to the Complaint within thirty (30) days after proper service of the Complaint upon the State Treasurer.